

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

In re:

Swain Landing LaPlata JC, LLC

Debtor.

Case No. 25-184-ELG  
(United States Bankruptcy Court  
for the District of Columbia)

Claudia Engelhorn, *et al.*

Plaintiffs,

v.

Erik D. Bolog, *et al.*

Defendants.

Case No. 1:25-ap-00159  
(United States Bankruptcy Court for  
the District of Maryland)

**MOTION FOR ADMISSION *PRO HAC VICE***

TO THE HONORABLE COURT:

I, Douglas F. Gansler, am a member in good standing of the bar of this Court. I am moving the admission of Matthew M. Karlan to appear *pro hac vice* in this case as counsel for Erik D. Bolog, Erik D. Bolog as Trustee of the JAREB Irrevocable Trust Agreement dated October 11, 2021, Darnestown Road, Inc., and Science Park Associates, LLC.

The undersigned certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland.
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts and was admitted to such courts on the following dates:
  - State of New York, First Department: February 27, 2012;

- United States District Court for the Southern District of New York: July 17, 2012;
- United States District Court for the Eastern District of New York: August 16, 2022;
- United States Court of Appeals for the Second Circuit: August 31, 2018;
- State of Connecticut: March 13, 2024.

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted *pro hac vice* in this Court zero times.

4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction.

5. The proposed admittee is familiar with the Maryland Attorneys' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure, and the Local Rules of this Court, and understands he shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

7. The undersigned Douglas F. Gansler is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

8. The \$100.00 fee for admission *pro hac vice* accompanies this motion.

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

Dated: June 25, 2025

MOVANT

Respectfully submitted,

CADWALADER, WICKERSHAM & TAFT LLP

Respectfully,



Douglas F. Gansler (Bar Number: 21010)  
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PROPOSED ADMITTEE

By: /s/ Matthew M. Karlan  
Matthew M. Karlan  
(signed by Douglas F. Gansler with permission of  
Matthew M. Karlan)  
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*Counsel for Defendants Erik D. Bolog, Individually  
and as Trustee of the JAREB Irrevocable Trust  
Agreement dated October 11, 2021; Darnestown  
Road, Inc.; and Science Park Associates, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of June, 2025, a copy of the foregoing was served electronically via CM/ECF upon counsel of record, and remaining parties served via first class mail.

**Counsel of Record Served via CM/ECF:**

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*Counsel for Defendant Swain Landing LaPlata JC, LLC*

Respectfully,



**Parties Served Via First Class Mail:**

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**Michael Postal**

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**POJO LaPlata LLC**

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